

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

Civil Action No. 5-11-CV-00353-H

MUHAMMED BAZZI,

Plaintiff,

v.

**PA NDERRY M'BAI, FREEDOM
NEWSPAPER, INC., and JOHN DOE**

Defendants.

**DEFENDANTS' (PA NDERRY M'BAI
and FREEDOM NEWSPAPER, INC.)
INITIAL DISCLOSURES**

Pursuant to Rule 26 (a)(1) of the Federal Rules of Civil Procedure, Defendants Pa Nderry M'Bai ("M'Bai") and Freedom Newspaper, Inc. ("Freedom") (M'Bai and Freedom referred to collectively as "Defendants"), provide the following initial disclosures.

I. Identification of Individuals Pursuant to Rule 26(a)(1)(A)

Subject to all applicable privileges and immunities, the following individuals are likely to have discoverable information that Defendants may use to support their defenses, excluding (i) individuals who may be used solely for impeachment and (ii) experts whose disclosure is governed by Rule 26(a)(2):

1. M'Bai likely has discoverable information relating to the nature, purpose, and scope of Freedom's business; M'Bai's relationship to Freedom; M'Bai's authorship of the February 26, 2011 Article identified in paragraph 7 of the Complaint ("Article") [DE 1]; and the

allegations in the Complaint and the Answer To Complaint [DE 12]. Mr. M'Bai is represented by the undersigned counsel, and may be contacted only through the undersigned counsel.

2. Plaintiff Muhammed Bazzi is likely to have discoverable information relating to the subject matter of the Article; the nature, purpose, and scope of Bazzi's business activities in The Gambia and in other countries; Bazzi's relationships with Yayha Jammeh, the president of The Gambia and other government officials in The Gambia; Bazzi's knowledge of political corruption, political repression, and organized crime in The Gambia and in other countries; Bazzi's involvement in political corruption, political repression, and criminal activities in The Gambia and in other countries; Bazzi's relationship with Hezbollah, the militant group and political party classified by the United States and other countries as a terrorist organization; Bazzi's knowledge of and participation in efforts to intimidate M'Bai into refraining from reporting on conditions in The Gambia; and the allegations in the Complaint and the Answer To Complaint.

3. An individual named Abdula associated with Bazzi in The Gambia. Abdula's full name and address are unknown. He likely has information relating to the allegations in the Complaint and the Answer To Complaint and to the matters described in paragraph 2 above.

4. Individuals, not yet known to Defendants, who have facts relating to the allegations in the Complaint and the Answer To Complaint and to the matters described in paragraph 2 above.

II. Description of Documents and Electronically Stored Information Pursuant to Rule 26(a)(1)(B)

1. The Article and, subject to all applicable privileges and immunities, emails and other communications, if any, relating to the Article.

III. Computation of Damages Pursuant to Rule 26(a)(1)(C)

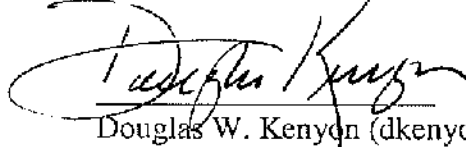
1. Defendants have not asserted claims for damages.

IV. Insurance Coverage Pursuant to Rule 26(a)(1)(D)

1. There is no insurance agreement under which an insurance business may be liable to satisfy part or all of a any possible judgment against the Defendants or to indemnify or reimburse for any payment made to satisfy any possible judgment.

Dated this 11th day of February, 2013.

HUNTON & WILLIAMS LLP



Douglas W. Kenyon (dkenyon@hunton.com)

N.C. State Bar No. 13242

R. Dennis Fairbanks (dfairbanks@hunton.com)

N.C. State Bar No.: 33572

HUNTON & WILLIAMS LLP

Post Office Box 109

Raleigh, North Carolina 27602

Telephone: 919.899.3000

Facsimile: 919.833.6352

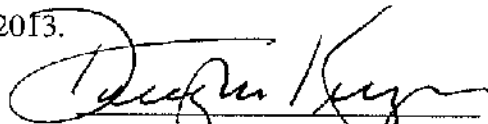
*Counsel for Defendants Pa Nderry M'Bai and
Freedom Newspaper, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of **DEFENDANTS' (PA NDERRY M'BAI and FREEDOM NEWSPAPER, INC.) INITIAL DISCLOSURES** has been served today upon Edward H Maginnis, counsel of record for plaintiff Muhammed Bazzi, by electronic mail sent to the email address below:

Edward H. Maginnis (emaginnis@maginnislaw.com)
N.C. State Bar No. 39317
Maginnis Law, PLLC
19 West Hargett Street, Suite 906
Raleigh, NC 27601
Telephone: 919.526.0450
Facsimile: 919.882.8763.

This the 11th day of February, 2013.



HUNTON & WILLIAMS LLP
421 Fayetteville Street, Suite 1400
Raleigh, N.C. 27601
Counsel for Defendants Pa Nderry M'Bai and
Freedom Newspapers, Inc.